To: Mastro, Donna[mastro.donna@epa.gov]; Snyder, Doug[Snyder.Doug@epa.gov]

From: Maldonado, Zelma Sent: Fri 8/28/2015 5:48:50 PM

Subject: RE: MarkWest meeting with EPA/DOJ/PADEP on Sept. 2

I agree Doug! It is over-lawyered but if you feel you need to go and that **you have the time,** go ahead. Chip is driving on Tuesday afternoon. My guys have gotten used to driving as opposed to flying because they are always carrying equipment.

Zelma Maldonado

Associate Director

Office of Air Enforcement and

Compliance Assistance (3AP20)

1650 Arch Street

Philadelphia, PA 19103

215-814-3448

From: Mastro, Donna

Sent: Friday, August 28, 2015 12:01 PM

To: Snyder, Doug **Cc:** Maldonado, Zelma

Subject: Re: MarkWest meeting with EPA/DOJ/PADEP on Sept. 2

Up to you- if you have the time and want to go- you can arrange. We have \$\$-- but it would be a few days out of office for you- don't want you losing time- I see this mainly as technical for and but I'm fine if you'd like to go. Is chip flying there I assume ??

Donna L. Mastro | Office of Regional Counsel R3 | Air Branch Chief | 215 814 2777

On Aug 28, 2015, at 11:49 AM, Snyder, Doug <Snyder.Doug@epa.gov> wrote:

Donna,

I informed Kathryn that it was unlikely that I would attend mtg., but R3 had not yet decided. Should I ask Mary if she wants me to attend the mtg.? It could be useful for me for understanding the operations, but I could use the time for R3 end of year matters and I also think this matter is over-lawyered already. Kathryn C. is going. Let me know. Chip is going. Zelma – what do you think?

Doug

From: Caballero, Kathryn

Sent: Friday, August 28, 2015 9:47 AM **To:** Amon, Tyler; Landsman, Allison

Cc: Chapman, Apple; McAuliffe, Mary; Snyder, Doug; jeffrey.Sands@usdoj.gov

Subject: FW: MarkWest meeting with EPA/DOJ/PADEP on Sept. 2

Tyler and Allison, please see the email below. Mary and Doug, our criminal colleagues will also be participating in the meeting at the request of MarkWest. Thanks.

Kathryn Pirrotta Caballero

Attorney-Advisor

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From: Caballero, Kathryn

Sent: Thursday, August 27, 2015 3:17 PM

To: 'Christopher Rimkus'

Cc: Snyder, Doug; McAuliffe, Mary; jeffrey.Sands@usdoj.gov Subject: MarkWest meeting with EPA/DOJ/PADEP on Sept. 2

Chris, as we briefly discussed yesterday, we have a proposed agenda for our Wednesday, Sept. 2, 2015 meeting (below). Please let us know if you have additions or comments on the proposed agenda. I understand that we will begin at 8:30 am at the Southpointe offices in Canonsburg, PA (4600 J. Barry Court, Suite 500). We request that MarkWest provide a conference line for participants to join remotely while we are in the office location. Please send us the names of the MarkWest individuals who will participate (and counsel) and any necessary logistical and PPE information. We are compiling our list of individuals to share with you and will provide our own vehicles.

- 1. Step-by-step narrative description of the pigging operation by MarkWest operators while observing at least one launching and one receiving operation (visit at least 2 sites);
- 2. Technical discussions on the use of vapor recovery and stick flare combination for controls;
- a. Installing controls as stand-alone systems for pigging operation?
- b. Connecting to existing controls at neighboring production sites?

- 3. Emissions impact by installing high to low pressure jumper line;
- a. Has this modification been performed at all sites across Ohio, Pennsylvania, and West Virginia?
- b. What happens to the liquids with this modification?
- 4. Discuss EPA Reference Methods and duration of each stack test;
- 5. Factors in determining the frequency of pigging;
- a. Opportunities to reduce the frequency?

On Sept. 3, our technical team plans to visit additional MarkWest locations, which we anticipate identifying over the next few days and will share with you. We have four questions as we prepare for those visits:

- (1) As we plan to bring our FLIR cameras, please advise as to whether a hot-work permit will be needed;
- (2) We are interested in visiting the Drugman site during a pigging operation and would like to know the time at which that operation occurs;
- (3) Can you identify high-pressure sites that are pigged on a daily basis that are located near Drugman?
- (4) On July 13, 2015, you emailed us an attachment with 20 Pennsylvania locations where emission calculation estimates exceeded 3 tpy for VOCs (attached for ease of reference). Can you clarify for us whether physical modifications (whether emission controls and/or pressure modifications) have occurred at all or some of these locations?

Please let us know if you have any questions on this information. Thanks.

Kathryn Pirrotta Caballero

Attorney-Advisor

U.S. EPA Office of Civil Enforcement

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Air Enforcement Division

<MarkWest emission information from Rimkus 7.13.15.pdf>